

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AVELARDO RIVERA and YASMINE  
ROMERO, individually, and on behalf of all  
others similarly situated,

Plaintiffs,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:22-CV-00269-JHC

STIPULATED MOTION AND  
ORDER TO EXTEND ANSWER  
DEADLINE AND MODIFY MOTION  
TO COMPEL BRIEFING SCHEDULE

NOTED ON MOTION CALENDAR:  
July 31, 2023

Pursuant to Local Civil Rules 7(d)(1) and 10(g), defendant Amazon Web Services, Inc. (“AWS”) respectfully moves for a short extension of the deadline for AWS to file its answer to the Second Amended Complaint (Dkt. 88) filed by Plaintiffs Avelardo Rivera and Yasmine Romero (“Plaintiffs,” and together with AWS, the “Parties”). AWS has consulted with Plaintiffs’ counsel and Plaintiffs do not object to that requested relief. In addition, the Parties jointly move to modify the briefing schedule for Plaintiffs’ pending motion to compel discovery (Dkt. 83).

In support of the foregoing requests for relief, the Parties state as follows:

1. Former named plaintiff Jacinda Dorian filed the original complaint in this case on March 7, 2022. *See* Dkt. 1.

2. Amazon filed a motion to dismiss the original complaint on May 16, 2022. *See* Dkt. 21.

3. On September 20, 2022, the Court allowed Ms. Dorian to file a First Amended Complaint (“FAC”) substituting Avelardo Rivera and Yasmine Romero as the named plaintiffs. *See* Dkt. 43.

4. Amazon moved to dismiss the FAC on October 19, 2022. *See* Dkt. 45.

5. On July 21, 2023, the Court granted the Parties’ stipulated motion to allow Mr. Rivera and Ms. Romero to file a Second Amended Complaint (“SAC”). *See* Dkt. 81.

6. On July 24, 2023, Plaintiffs filed a motion to compel responses to certain discovery requests and certain Rule 30(b)(6) testimony. *See* Dkt. 83.

7. Plaintiffs filed their SAC on July 26, 2023. *See* Dkt. 88. That same day, the Court denied AWS’s motion to dismiss. *See* Dkt. 89.

8. Pursuant to Federal Rule of Civil Procedure 12(a)(4), AWS’s deadline to file its answer to the SAC is August 9, 2023.

9. Pursuant to Local Rule 7(d)(3), AWS’s deadline to file its opposition to Plaintiffs’ motion to compel discovery is August 7, 2023. Plaintiffs’ deadline to file their reply in support of their motion to compel discovery is August 11, 2023.

10. Given the complexity of this case, the discovery that has been exchanged to date, a Rule 30(b)(6) deposition scheduled for August 2, 2023, and the Court’s recent order denying AWS’s motion to dismiss, AWS requires additional time to prepare its answer to the SAC. Further, the Parties have conferred and agree that they require additional time to investigate and brief the issues related to Plaintiffs’ pending motion to compel discovery. Good cause exists for these extensions based on the complexity of this matter, the current procedural posture, and pre-planned absences of the parties and their counsel.

11. In light of the foregoing, AWS respectfully requests that the Court extend to August 23, 2023 AWS's deadline to file its answer to Plaintiffs' SAC. Plaintiffs do not oppose that request.

12. Further, the Parties jointly request that the Court modify the briefing schedule for Plaintiffs' pending motion to compel discovery as follows:

a. AWS's opposition brief shall be filed on or before August 21, 2023.

b. Plaintiffs' reply brief shall be filed on or before September 5, 2023.

WHEREFORE, the Parties respectfully request that the Court enter an order extending existing case deadlines in accordance with this Stipulated Motion.

Dated: July 31, 2023

By: /s/ Ryan Spear

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YASMINE ROMERO

ORDER

IT IS SO ORDERED.

DATED this 1st day of August, 2023.

  
HONORABLE JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

Presented by:

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